

## UNITED STATES DISTRICT COURT

for the

District of New Mexico

United States of America )

v. )

Adrian SOTO )

Defendant(s)

Case No.

16-MJ-1290

FILED  
At Albuquerque NM

MAR 29 2016

MATTHEW J. DYKMAN  
CLERK

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 3/29/2016 in the county of Bernalillo in the  
Judicial District of New Mexico, the defendant(s) violated:

## Code Section

21 USC 841 (a) (1), (b) (1) (A)

## Offense Description

Possession of more than 500 grams of a  
mixture or substance containing a  
detectable amount of Methamphetamine

This criminal complaint is based on these facts:

\*\*\* SEE ATTACHED AFFIDAVIT \*\*\*

☒ Continued on the attached sheet.

Complainant's signature

S/A Jarrell W. Perry, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 3/29/2016City and state: Albuquerque, New Mexico

Judge's signature

KAREN B. MOLZEN

U.S. MAGISTRATE JUDGE

**AFFIDAVIT**

On March 29, 2016, Drug Enforcement Administration (DEA) Special Agent (S/A) Jarrell W. Perry and Immigration Customs Enforcement (ICE) Deportation Officer Matt Salcido were at the Greyhound Bus Station in Albuquerque, New Mexico when the eastbound Greyhound Bus arrived for its regularly scheduled stop in Albuquerque, New Mexico.

S/A Perry approached a male, who was later identified as Adrian SOTO, who was sitting in his respective seat on the Greyhound Bus. S/A Perry displayed his DEA badge to SOTO, identified himself as a police officer to SOTO, asked for and received permission to speak with SOTO.


After a short conversation, S/A Perry asked SOTO if he had any luggage with him. SOTO said that he had one piece of checked in luggage underneath of the bus. S/A Perry asked for and received permission from SOTO to search his checked in luggage for contraband. S/A Perry located a blue colored, hard-sided suitcase underneath of the bus in the name of Adrian SOTO. A consensual search of SOTO's checked in suitcase revealed a gift wrapped package. S/A Perry opened up the gift-wrapped package, which revealed a shoe box containing a clear plastic, heat-sealed package.


S/A Perry immediately knew from his experience that the clear plastic, heat-sealed package was consistent with illegal narcotics. S/A Perry handcuffed SOTO, thus placing him under arrest.

SOTO was transported to the DEA ADO. At the DEA ADO, S/A Perry and Officer Salcido removed a total of four clear plastic heat-sealed bundles from SOTO's suitcase. S/A Perry and Officer Salcido weighed the four bundles, for a total weighed of approximately 4.95 gross kilograms (11.088 gross pounds). S/A Perry knew that based upon his training and experience that this is an amount that is consistent with distribution rather than personal use. S/A Perry and Officer Salcido cut into the three bundles, which

revealed a clear crystal like substance, which field-tested positive for the presence of methamphetamine.

This affidavit is submitted for the limited purpose of providing probable cause to support the attached criminal complaint.

  
\_\_\_\_\_  
Chief United States Magistrate Judge

  
\_\_\_\_\_  
Jarrell W. Perry  
Special Agent  
Drug Enforcement Administration